

1 **WILLIAM R. TAMAYO, SBN 084965**
2 **JONATHAN T. PECK SBN 12303 (VA)**
3 **LINDA S. ORDONIO-DIXON, SBN 172830**
4 **U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**
5 **San Francisco District Office**
6 **350 The Embarcadero, Suite 500**
7 **San Francisco, CA 94105-1260**
8 **Telephone No. (415) 625-5658**
9 **Fax No. (415) 625-5657**

10 **Attorneys for Plaintiff**

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 **EQUAL EMPLOYMENT**
14 **OPPORTUNITY COMMISSION,**

15 **Plaintiff,**

16 **ABDELLATIFF HADJI,**

17 **Plaintiff-Intervener,**

18 **v.**

19 **ALBION RIVER INN,**

20 **Defendants.**

21 **Case No. C 06-05356 SI**

22 **STIPULATED MOTION TO EXTEND**
23 **FACT DISCOVERY DEADLINE;**
24 **[PROPOSED] ORDER**

25 Pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-2(d), the parties to this
26 action hereby jointly request a one week extension of the fact discovery deadline in the instant lawsuit
27 as specifically provided herein. The current deadline is Friday, October 12, 2007.

28 Good cause exists for the requested extension as the parties have diligently attempted to
complete discovery prior to the current deadline but have been impeded by an unexpected difficulty in
the availability of deposition witnesses and the unavailability of a person responding to a document
subpoena.

This short extension will allow the following: [1] an extension for Intervenor's responses to
written discovery; [2] permit the deposition of Laura Spradlin on October 17th [delayed due to late

1 production of a document]; and [3] to allow the parties to attempt to resolve a dispute concerning the
2 defendant's and third parties' claims to financial privacy of documents subpoenaed from an absent
3 witness [who does not return until the week after the close]. This is the only additional discovery that
4 will be conducted. This is the first request for the extension of a deadline in this case. No other
5 deadlines in the case will be affected by this request.

6 Based on the foregoing, the parties respectfully request that the fact discovery deadline be
7 extended to October 19, 2007.

8
9 E-FILING CONCURRENCE: I, the undersigned, attest that I have obtained the concurrence of
10 all counsel for the filing of the instant pleading.

11
12 Dated: October 11, 2007

13 By: //s//
14 Linda S. Ordonio-Dixon

15
16 It is so ORDERED.

17 
18
19
20
21
22
23
24
25
26
27
28